



Sexual Assault Support Service (SASS) Inc.

Submission to the Child Safety Reform Implementation Monitor

September 2025

Content warning

This submission contains reference to child sexual harm – including child sexual abuse, exploitation and harmful sexual behaviours. We encourage readers to exercise care as they engage with this content. If the information in this document raises concern or distress, the following services can be contacted for support:

State-wide Sexual Assault Support Line

24/7 support provided by Sexual Assault Support Service and Laurel House

Ph: 1800 697 877

1800RESPECT

24/7 counselling and information support for domestic, family and sexual violence

Ph: 1800 737 732 | SMS: 0458 737 732 | webchat: <https://1800respect.org.au/>

13 YARN

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Kids Helpline

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About SASS

Sexual Assault Support Service Inc. (SASS) is a non-government, specialist sexual assault support service dedicated to promoting the safety, wellbeing, and agency of victim survivors, and those at risk of or impacted by sexual violence. We work across the prevention continuum – primary prevention, early intervention, response, recovery, and healing – to deliver evidence-based, best practice and trauma-informed services.

In collaboration with government, non-government, and community stakeholders, we work to amplify the voices and experiences of victim survivors and their support networks to inform legislative, policy, and sector reform that is attuned to the unique needs, complexities and impacts of sexual violence. We take a holistic approach, supporting individuals and families to heal from harm, while actively working to challenge the underlying drivers, structures, norms and attitudes that enable sexual violence. This approach reflects our vision for a Tasmania free from sexual violence.

Please direct any enquiries about this submission to:

Shirleyann Varney

Chief Executive Officer

Phone: (03) 6231 0044

Email: shirleyann.varney@sass.org.au

Introduction

Sexual Assault Support Service (SASS) welcomes the opportunity to provide a submission to the Child Safety Reform Implementation Monitor (the 'Monitor') in relation to its role as an independent entity to monitor, oversee, evaluate and report on the Tasmanian Government's implementation of relevant inquiries (the 'implementation project'), including:

- [Commission of Inquiry into the Tasmanian Government's Responses to Institutional Child Sexual Abuse](#) (the 'COI')
- [Independent Inquiry into the Tasmanian Department of Education's Responses to Child Sexual Abuse](#) (the 'DoE Inquiry')
- [Royal Commission into Institutional Responses to Child Sexual Abuse](#) (that were accepted but have not been implemented)
- [Review of Child Safety and Governance in the Launceston General Hospital and Human Resources](#)
- [Weiss Independent Review into Paul Reynolds](#) (the 'Weiss Review').

This submission is informed by our experience as a specialist, non-government sexual assault support service and our work across the prevention continuum with individuals, families and community members who have experienced or been affected by sexual harm, and our participation to date within the reform implementation project.

It is not intended to provide a comprehensive overview of the extensive work already underway through the implementation project and supplements our previous submission to the Joint Sessional Committee Inquiry into the implementation of the Commission of Inquiry recommendations in February 2025 (attached at appendix 1 for your consideration).¹ Instead, this submission highlights key observations about the broader child safe reform project and the implementation of specific recommendations, and identifies opportunities for change.

We welcome enquiries from the Monitor and their Office regarding the content of this submission, as well as feedback about recommendations not addressed here.

Key observations about the reform project

Promote the use of the Child Rights Impact Assessment framework and tool to strengthen coordinated rights-based policy

While the Tasmanian Government has committed to implementing the COI recommendations in full, recent policy and legislative developments – such as the *Police Powers and Responsibilities Act Proposal Paper 2024*, the *Police Offences Amendment (Knives and Other Weapons) Bill 2025*, and the *Bail Bill 2024* – highlight inconsistencies in the development of policy that is likely to affect the safety and wellbeing of children. This reinforces the importance of implementing a whole of government approach to policy and legislative reform, to promote greater coordination across agencies, strengthen

¹ In particular, we draw your attention to 'a more coordinated approach to consultation' p. 6 and 'best practice – consulting with people with lived experience' p. 6-7. We note that stakeholders continue to raise concerns about consultation fatigue and the need for more effective consultation processes across the reform project to date. In doing so, we also acknowledge the need to minimise the risk of further institutional harm by ensuring that the substantial knowledge already provided by victim survivors, advocates and allies is meaningfully integrated into the ongoing design and delivery of reform.

consistency and support the Government to uphold its commitment to ensuring the safety and wellbeing of children.

To achieve this, we continue to support advocacy for the adoption (and/ or adaption) of Child Rights Impact Assessment (CRIA) framework and tool within the Tasmanian policy context.² The CRIA provides a structured and consistent process for policy and decision makers to assess and monitor the impacts of policy and legislation on children's rights and wellbeing. Embedding the CRIA across Government, would provide policy makers with a practical mechanism to systematically consider the impacts to children across the policy cycle, identify risks and balance competing priorities. Further, public reporting of the CRIA process would also enhance transparency and strengthen community trust by making clear how government decisions affect children.³

Noting the endorsement of the CRIA by the National Children's Commissioner, we believe that embedding the CRIA across Government would be a significant step toward stronger coordination, accountability and child-centred practice in policymaking – to support reform that is proactive, targeted and sustainable to deliver better outcomes for children, families and communities over the long term.⁴

Promote greater transparency about investment in the child safe reform project

We welcome the development of the Monitor's Implementation Framework, which we understand will play a key role in promoting greater transparency and accountability about the implementation of reforms.

In previous submissions, we have emphasised the importance of clear and accessible reporting on investment in the reform project, including demonstrating how resources are being allocated by Government and how investments are delivering improved outcomes for children.⁵ At the same time, we have previously raised concerns about the limitations of the State Budget papers in providing sufficient clarity on this issue. For instance, the May 2025–26 State Budget papers indicated a 90% decrease in funding for the 'Child and Youth Wellbeing' Output over the forward estimates. While this reduction is attributed to reallocations to other agencies and the anticipated completion of COI recommendations, the Budget papers did not clearly show where funds have been redirected or what this means for the children.

Transparent reporting on both investment and outcomes is critical – not only to monitor progress, but also to build and sustain public trust, enable effective collaboration between government and the community sector, and demonstrate that reforms are delivering tangible and lasting benefits for children, families and communities.

We believe that greater transparency would assist stakeholders to:

² Australian Human Rights Commission (2023), [Child Rights Impact Assessment \(CRIA\) tool](#) and [Safeguarding Children: Using a child rights impact assessment to improve our laws and policies](#).

³ AHRC (2023), [Safeguarding Children: Using a child rights impact assessment to improve our laws and policies](#), p. 25.

⁴ Australian Human Rights Commission (2023), Media release: [National Children's Commissioner urges governments to monitor child rights](#).

⁵ SASS (2025), submission to the [Joint Sessional Committee Inquiry into the implementation of the Commission of Inquiry recommendations](#).

- Understand whether previously funded initiatives have been completed, reduced or transitioned.
- Assess the scale and appropriateness of investment across prevention, early intervention and tertiary initiatives, and whether systemic reforms are being effectively supported.
- Identify how resources are distributed between government and non-government organisations in advancing child and youth safe reforms.
- Consider how budgetary decisions align with the Government's stated commitments to deliver outcomes through the implementation project.
- Better interpret the Government's priorities, particularly in the context of broader fiscal pressures.
- Anticipate and respond to the flow-on effects of budget decisions for service delivery across the sector, including the capacity of organisations to meet the needs of children, families and communities.

Approaches in other jurisdictions highlight opportunities that could strengthen reform efforts in Lutruwita/Tasmania. In Scotland, the implementation of the Independent Care Review's conclusions led to the development of The Promise – a public commitment and independent entity dedicated to reforming Scotland's 'care' system and ensuring that every child and young person grows up safe, loved and respected.⁶ This work included a financial analysis, documented in the 'Follow the Money' report which sets out the rationale and feasibility of changing how Scotland invests in its 'care' system.⁷ The report outlines where investment has been directed and demonstrates how transparent financial reporting can clarify decision-making, show how funds are allocated across the system, and assess the viability of alternative funding approaches.

We believe greater transparency in reporting on how investment is directed and how it contributes to the objectives of child safe reforms would strengthen public understanding of reform progress and demonstrate sustained government commitment to improving outcomes for children, families and communities.

Implementation of COI and Weiss Review recommendations

Child sexual abuse prevention education in schools

COI Recommendation 6.1⁸

⁶ [The Promise Scotland](#) (2025).

⁷ In 2020, the [Independent Care Review](#) published seven reports – The Promise and a Pinky Promise for younger readers, The Plan, The Money and [Follow the Money](#), The Rules, Thank You. These reports reflect the changes the Care Review recommends, plans for implementing changes and the investment in services that is required.

⁸ Recommendation 6.1:

1. *The Department for Education, Children and Young People should introduce and fund a mandatory child sexual abuse prevention curriculum as part of the mandatory respectful behaviours curriculum from early learning programs to Year 12, across all types of government schools (including specialist schools)...*
3. *The Department should develop a plan for sustained implementation of the mandatory prevention curriculum. The plan should:*
 - a. *set out the goals and objectives of implementing the mandatory prevention curriculum*
 - b. *define the roles and responsibilities of key participants*
 - c. *include criteria for evaluating the curriculum.*

Support the integration of specialist primary prevention education alongside RRCE to enhance outcomes in school communities

We welcome the Department for Education, Children and Young People's (DECYP) work to building capability and capacity in Tasmanian public schools through the implementation and delivery of the whole-of-school Respectful Relationships and Consent Education (RRCE) program to model positive environments, appropriate behaviours and appropriate responses to incidents and experiences of harm.⁹

SASS is currently funded by the Tasmanian Government to deliver our whole-of-school, CaRE program to public schools, from grades 3 to 12 across the state. Delivered by our specialist educators, CaRE complements the RRCE program by providing school communities with access to specialist expertise in trauma-informed practice, child development, and preventing, identifying and responding to child sexual abuse, exploitation and harmful sexual behaviours. In practice, our educators support children and their personal and professional support networks to build knowledge about autonomy, rights, respect, sexuality, safety and power; to challenge shame and stigma; and model developmentally appropriate content delivery and promote cultures of safety, inclusion and respect.

This work is complex, nuanced and sensitive and plays a critical role in the primary prevention, early intervention and tertiary responses to harm. Feedback from school communities – including students, parents, carers, teachers and professionals – consistently reinforces the value of delivering CaRE alongside RRCE. This is reflected in the following:

- At the end of each CaRE session, students are invited to submit anonymous enquiries to SASS educators, which are addressed in the next session. In 2024, approximately 15% of these 'enquiries' were disclosures from children. This emphasises the importance of external partnerships, ensuring that children have access to trusted adults beyond their immediate school environment. Such partnerships not only create safer avenues for disclosure and response but also strengthen institutional accountability and support schools in their role as open, child-safe institutions.
- Trends in questions raised by students and identified by specialist educators during CaRE sessions can also alert schools to developed or emerging issues that they are not aware of.
- Teachers and school staff often report low confidence and high variability in delivering RRCE, while highlighting the value of observing specialist educators' model best practice.¹⁰
- Prevention education enhances the early identification of concerns of harm. CaRE sessions generate an increase in referrals to SASS' therapeutic services and follow up requests from schools seeking guidance on improved prevention and response to concerns or experiences of harm.
- Schools are seeking increased support from SASS to respond to the growing prevalence of harmful sexual behaviours among younger students (directed toward other students and teachers) from prep to grade 3, who sit outside of the scope of CaRE under current funding provision.

⁹ Tasmanian Government, Department of Education, Children and Young People (2025), [About Respectful Relationships Education](#).

¹⁰ This aligns with research findings from ANROWS about teachers experiences delivery RRE, [Summary of findings: A social network analysis and implementation study of an intervention designed to advance social and emotional learning and respectful relationships in secondary schools](#) (2023).

- Collaboration between schools, and our educators and clinical teams enables CaRE to be adapted to the needs and experiences within individual communities, strengthening relevance and impact as a place-based prevention program.

Despite demand, access to CaRE varies considerably across schools as it is limited by funding. Of the enquiries we received in 2025, only 40% of public schools that sought fee for service were able to proceed with bookings, compared to 80% of private schools. Expanding subsidised access to CaRE – particularly within the early years of schooling and across public school communities – would build on current momentum, strengthen consistency, and ensure all Tasmanian students have equitable access to trauma-informed, evidence-based specialist prevention education. This would support schools and families to prevent harm, promote positive cultural change and deliver better outcomes for children.

Harmful sexual behaviours – meeting the needs of care experienced children

COI recommendation 9.26¹¹

Highlight the need to develop knowledge, practice and policy to clarify distinctions between restrictive practice and proportionate safeguarding

We support the implementation of practice models that ensure children are actively involved in the development of their care plans – including changes over time – to uphold their right to participate in decisions that affect them and to ensure that care and safety plans reflect their experiences, needs and views. We also recognise the value of engaging relevant stakeholders, including specialist practitioners working with the child and/ or their families, in the development and facilitation of safety planning to promote collaborative and coordinated efforts to prevent and respond to experiences of harm.

In practice, we have observed different approaches to safety planning and their implications. One recurring theme pertains to restrictive practice policy, where recommendations made by specialist clinicians working therapeutically with children who display harmful sexual behaviours – including measures developed in consultation with the child, such as agreed limits on the use of certain electronic devices – have not been implemented as they are interpreted within agency or organisational policy as constituting restrictive practice.

We acknowledge that agencies and organisations can apply for authorisation to use a restrictive practice where it is demonstrated that this is in the child’s best interests. However, in practice, some uncertainty about safeguarding responsibilities and organisational concerns about compliance, liability and notifications about the use of restrictive practice appear to create hesitancy to implement measures designed to reduce risks for children who have displayed or have been victimised by sexual abuse, and/ or harmful sexual behaviours.

¹¹ COI Recommendation 9.26

The Department for Education, Children and Young People should ensure:

- each child’s care plan is informed by the holistic assessment (Recommendation 9.23) and the interests and aspirations of the child*
- care plans include strategies to address identified risks of child sexual abuse, including the risk of harmful sexual behaviours and child sexual exploitation*
- the care team reviews any risk assessments and management plans for child sexual abuse at least every six months, or more frequently if incidents occur or circumstances change such as when a new child joins the household.*

As broader reforms progress to strengthen capability and understanding of child sexual abuse, exploitation and harmful sexual behaviours, we note an opportunity to provide further guidance on collaborative safety planning and distinctions between restrictive practice and proportionate safeguarding. We believe that such support would promote stronger collaboration, coordination and consistency in the development and implementation of children's safety plans, and encourage practitioners to act with greater confidence, in the child's best interests, without undue concern of regulatory impact.

Strengthening independent oversight – Tasmania Police

COI Recommendation 16.7¹²

Weiss Recommendation 5¹³

Promote strengthened independent oversight of Tasmania Police in relation to risks and investigations of misconduct

The COI and Weiss Review¹⁴ both identified the importance of strong, independent oversight and accountability where members of Tasmania Police are alleged to have groomed and/ or sexually abused a child.

¹² COI Recommendation 16.7

Tasmania Police should:

- a. establish a clear, publicly accessible process for reporting and responding to allegations of child sexual abuse against a member of Tasmania Police, including the ability to report to an entity independent of police such as the Integrity Commission; b. expand the domestic violence review panel to cover child sexual abuse and ensure independence in investigations when a member is alleged to have been involved in child sexual abuse.*

¹³ [Weiss Review](#) Recommendation 5:

That consideration be given by Tasmania Police to making a recommendation to the Tasmanian Government for amendments to the Integrity Commission Act 2009 to ensure that all notifications made to the Integrity Commission in respect of members of Tasmania

Police who are alleged to have groomed and/or sexually abused persons [serious misconduct] can be investigated independently by the Integrity Commission through:

- a. authorising access to Tasmania Police investigation databases;*
- b. providing coercive examination powers;*
- c. recognising the Integrity Commission as a 'law enforcement agency' for the purpose of Tasmanian legislation under which applications for covert powers might be sought;*
- d. the ability to conduct (open or closed) hearings in relation to any matter relevant to the performance of its functions with as little formality and technicality as is consistent with a fair and proper consideration of the issues;*
- e. the ability to apply to a Magistrate or Justice of the Peace for a warrant for arrest in the first instance;*
- f. the ability to conduct wholly independent or joint investigations with Tasmania Police and/or other law enforcement bodies, or monitor and/ or oversee investigations conducted by Tasmania Police; and*
- g. extend jurisdiction for investigations of former Tasmania Police members provided that the conduct being investigated occurred while the person was an officer or employee.*

¹⁴ The Weiss Review Report states, the 'Tasmanian Integrity Commission's investigative powers fall short of its interstate counterparts with respect to matters of serious police misconduct' – Weiss Independent Review into Paul Reynolds (2024), [Final Report](#), p. 64.

We understand that COI recommendation 16.7 – which called for the establishment of clear, publicly accessible processes to report and respond to allegations of abuse, including reporting to an entity such as the Tasmanian Integrity Commission (TIC) – has been assessed as ‘completed’.¹⁵

While Tasmania Police have identified and implemented processes aimed to improve how serious cases of police misconduct are investigated,¹⁶ we do not believe that these mechanisms are sufficient to address the fundamental concerns that the COI heard about barriers to safety, justice and healing for victim survivors. This includes processes related to the application of police discretion in receiving and escalating reports of harm, misuse of police power, the inherent conflict of interest associated with internal investigations, and fear of retribution. We note that these issues are compounded by the limited capacity, powers and resourcing of the TIC to perform its functions.¹⁷

We also note the increasing urgency of robust, independent oversight given the proposed expansion of police powers, including provisions pertaining to the use of force and searches, and welcome information about work underway to implement Recommendation 5 of the Weiss Review.

Information sharing

COI Recommendation 19.8¹⁸

Recommend a broader review of Tasmania’s child information sharing provisions to identify and inform further reform

We support the implementation of recommendation 19.8 and agree that stronger guidance for government agencies will enhance information sharing, clarify roles and responsibilities and promote improved safeguarding practices. However, barriers to effective information sharing are also present across the non-government sector and hinder prevention, early intervention and response efforts. As

¹⁵ Tasmanian Government, Keeping Children Safe, [Recommendation Status](#), reviewed 25/08/2025.

¹⁶ The COI heard that allegations of child sexual abuse perpetrated by a police officer would ‘go to the Professional Standards Command’ for investigation under the Deputy Commissioner’s direction, and that the matter would then be reported to the Integrity Commission. COI Final Report, Vol. 7, [Chapter 16 – Criminal justice responses](#), 3.2.6 – Implementing policy complaints and oversight mechanisms.

¹⁷ We note the response from the Integrity Commission to the Weiss Review recommendation which emphasised that the Commission is unable to provide the level of investigation or oversight that the report recommends – Integrity Commission Tasmania (08 July 2025), [Integrity Commission response to the Weiss Review recommendation](#).

¹⁸ COI Recommendation 19.8

1. The Department of Premier and Cabinet should lead the development of child safety information sharing, coordination and response guidelines to support government and government funded agencies and statutory bodies to respond to child safety issues. The guidelines should:

- a) set out the principles which guide information sharing, cross-agency coordination and the roles of different services and entities in responding to child safety issues, and require that staff are trained on these issues
- b) identify a process for nominating a lead agency for cross-agency responses to individual child safety issues and set out the lead agency’s role and responsibilities
- c) identify a process for setting out the roles and responsibilities of collaborating agencies in responding to child safety issues
- d) explain child safety information-sharing obligations and responsibilities and how staff can fulfil them
- e) set out an escalation and dispute resolution process to resolve disagreements that may arise across agencies
- f) identify resources and professional development opportunities for staff in relation to responding to child safety issues
- g) be subject to periodic review to ensure they remain up to date and accurately reflect best practice cross-agency information sharing and coordination arrangements.

2. The Tasmanian Government should fund the culture change work required to achieve good information-sharing practices.

such, we have previously recommended a broader review of Tasmania's information sharing provisions¹⁹ to:

- improve information sharing practices from government agencies to the community sector and between non-government services;
- enable earlier identification of risks and more comprehensive assessments of harm;
- clarify professional obligations and build confidence to share information lawfully and appropriately; and
- strengthen prevention and early intervention efforts.

The *Children, Young Persons and Their Families Act 1997* (the 'Act')²⁰ sets out the broad legislative framework for information sharing about the safety, wellbeing and welfare of children in Tasmania. Under the Act, government funded community service organisations are recognised as information-sharing entities. However, s.53A. and s. 53B. of the Act provides that relevant information cannot be shared between community sector organisations (or other information sharing entities) unless the child (or a relevant person) is known to a Community Based Intake Service (CBIS) or is subject to Child Safety Service intervention.

53A. Interpretation

In this Part –

relevant person means a person in respect of whom –

(a) the Secretary or a Community-Based Intake Service has received information under this Act; or

(b) an assessment order is in force; or

(c) a care and protection order is in force.

53B. Secretary and information-sharing entities may provide information

(3) An information-sharing entity may do either or both of the following if satisfied that information in its possession relates to the safety, welfare or wellbeing of a relevant person:

(a) provide the Secretary with the information, whether or not the Secretary has required the information to be provided;

(b) provide another information-sharing entity with the information if that entity is involved with, or is likely to be involved with, the relevant person or a significant person to the relevant person.

This presents a number of challenges:

- Limited scope for prevention and early intervention – community service organisations cannot share information unless the CBIS or Child Safety Service has been involved, restricting proactive responses before risks escalate.
- Centering statutory services – to share information under the Act, community service organisations are required to report to the CBIS. While this is necessary in many cases and fulfils legislative obligations, it also contributes to concerns about systems surveillance

¹⁹ SASS (2024), submission to the Change for Children Strategy.

²⁰ [Children, Young Persons and Their Families Act 1997 \(Tas\)](#)

particularly in the context of families who may experience structural disadvantage and greater risk of disproportionate statutory responses.

- Reliance on Memoranda of Understandings (MOUs) – in the absence of more comprehensive legislative and policy provisions, a broad range of MOUs have been established to facilitate information sharing between agencies and organisations. While a direct response to the current context, these arrangements are likely to result in inconsistent practice and raise concerns about accountability.
- Hesitancy to share information – lack of clear guidelines has led to individual and inconsistent interpretations of the legislation and a reluctance to share information even when permitted under the Act and in the best interests of the child. We have also observed that this uncertainty has fostered a greater willingness to share information verbally but a hesitancy to do so in writing.
- Absence of policy infrastructure – such as the guidelines established in Queensland²¹ and Victoria²² to support their respective child information sharing schemes. These guidelines have assisted professionals working across government and non-government sectors to determine when information sharing is appropriate and lawful, enabling the provision of more informed, holistic and coordinated support to children and families.
- Feedback loops – once information has been shared, it is not standard practice to receive updates or information about outcomes, even where this has been agreed. This can hinder ongoing risk management and support planning with the child, their personal and professional supports and the workforce.
- Common risk assessment framework – the Act is not supported by a comprehensive, common risk assessment to support information sharing and coordinated responses to risk.
- Variations in intervention thresholds and differing expectations across agencies and organisations continue to create uncertainty in how responses to risks and experience of harm are provided. Addressing this challenge requires not only clearer guidance, but also a shared understanding of thresholds, roles and responsibilities to ensure consistent approaches to safeguarding.

These challenges highlight the need for broader systemic reform to ensure consistent, lawful, and child-centred information sharing across both government and non-government sectors.

We encourage consideration of broader reforms to Tasmania's child safe information sharing provisions, supported by guidelines, training, and a standardised risk assessment framework to promote shared responsibility for child wellbeing, increase collaboration across services, address systemic hesitancy to share information in the interests of the child, and deliver better outcomes for children and families.

²¹ The [Child Protection Act 1999 \(Qld\)](#) provides a clear legislative basis for information sharing and is supported by the [Information Sharing Guidelines: to meet the protection and care needs and promote the wellbeing of children \(2018\)](#). These guidelines: outline obligations under the Act; set out what can be shared, when, and with whom; define mandatory reporting requirements; support lawful and consistent practice; and provide practical advice on storing and managing sensitive information. This framework has enabled government and non-government organisations to collaborate more effectively in protecting children.

²² [Child Wellbeing and Safety Act 2005 \(Vic\)](#); and Victorian Government, [Child Information Sharing Scheme Ministerial Guidelines: Guidance for information sharing entities](#) (2023), pp. 4.



Sexual Assault Support Service (SASS) Inc.

Submission to the Joint Sessional Committee Inquiry into the implementation of the Commission of Inquiry recommendations

February 2025

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About SASS

Sexual Assault Support Service (SASS) Inc. is Tasmania's Southern based, specialist sexual assault support service. For 38 years, we have been working to promote the interests of those who have experienced, are recovering from, are at risk of, or affected by sexual violence. We envision a world free from sexual violence, where people are safe and respected. We recognise the intersecting and compounding nature of power, oppression and violence which influence a person's experience of sexual harm, alongside their access to safety, support and recovery. We work across the prevention continuum to provide specialist, evidence-based, trauma-informed expertise within a range of primary prevention, early intervention, response and recovery programs.

By working closely with government bodies and other organisations, we aim to amplify the voices of victim survivors, ensuring that their insights shape policy development and responses to sexual violence. We believe in a holistic approach – supporting individuals to heal from sexual abuse and violence, while striving to challenge and change the attitudes, beliefs and drivers that enable the perpetration and perpetuation of sexual violence. Our work underscores our unwavering commitment to creating lasting change for individuals and communities affected by sexual violence.

Please direct any enquiries about this submission to:

Shirleyann Varney

Chief Executive Officer

Phone: (03) 6231 0044

Email: shirleyann.varney@sass.org.au

Introduction

SASS welcomes the opportunity to participate in the Joint Sessional Committee Inquiry into the implementation of the Commission of Inquiry recommendations (the 'Inquiry').

In 2023, the Tasmanian Government committed to implementing all 191 recommendations made by the Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings (the 'Commission of Inquiry').

We acknowledge the progress that has been made to implement the Commission of Inquiry recommendations (the 'Implementation Project') to date and to improve government responses to child sexual abuse. We also recognise the importance of key accountability mechanisms such as the Inquiry to consider issues and opportunities related to the Implementation Project.

This submission is informed by our experience as a specialist, non-government sexual assault services – our work across the prevention continuum (primary prevention, early intervention, response, recovery and healing) with individuals, families and community members affected by sexual harm and/ or violence, and our participation to date with the Implementation Project. It is not intended to provide a comprehensive review of the Implementation Project but seeks to highlight key observations that we have formed about the Implementation Project, as well as recommendations to promote the safety and wellbeing of Tasmanian children.

Key observations

Promoting prevention and expanding the scope of the Recommendations

Child sexual abuse is preventable and is best addressed through a whole-of-community, public health approach to target the underlying drivers of child sexual abuse, alongside intersecting forms of maltreatment and inequality that escalate risks to children.²³ Prevention efforts should be evidence-informed and rights-based to ensure that the needs and interests of children and young people are centred in policy and legislative reform, in practice, and in the community.

Throughout our participation in the Implementation Project, we have consistently emphasised the importance of prevention and early intervention in safeguarding children and young people from harm. This position is particularly significant given that the scope of the Commission of Inquiry focused on child sexual abuse perpetrated within and enabled by government institutions. While the findings were deeply distressing and demanded immediate change (particularly given the heightened vulnerability of children in contact with institutions), we note that child sexual abuse is predominantly perpetrated within the community, outside of institutional contexts. As such the internal focus on government reform, while necessary, risks narrowing broader prevention efforts across Tasmania.

One example of the need to extend preventative action beyond the scope of the Commission of Inquiry relates to Recommendation 19.8,²⁴ which tasks the Department of Premier and Cabinet with

²³ Ourwatch, [Change the Story: A shared framework for the primary prevention of violence against women in Australia \(second edition\)](#), 2021.

²⁴ [Recommendation 19.2](#) The Tasmanian Government should develop a whole of government approach to professional development on responding to trauma within government and government funded services, as well as statutory bodies, that provide services to children and young people or adult victim-survivors of child sexual abuse.

leading the development of child safety information-sharing, coordination, and response guidelines. This recommendation focusses on improving information sharing across government and is therefore unlikely to address the broader systemic barriers to effective information sharing that are present within the non-government sector. In response, we have previously recommended a review and further reform of Tasmania's information sharing provisions, drawing on legislative models in Victoria²⁵ and Queensland²⁶ to improve coordinated approaches to safeguarding, to enhance early identification of risk and more comprehensive assessments of harm, to build sector confidence to share relevant information, and to promote prevention and early intervention.

We also acknowledge the Government's work to progress the implementation of some prevention related recommendations, this includes Recommendation 19.1²⁷ to develop a Tasmanian strategy and action plan to prevent, identify and respond to child sexual abuse. The Change for Children strategy has been developed through broad public and targeted stakeholder consultations and at the time of writing, is in a final draft stage. A critical theme that emerged during the consultation period, was the need for public policy to be underpinned by a robust, evidence-based, prevention framework to address the broader socio-cultural contexts that enable child sexual abuse to occur within our communities.²⁸ This is consistent with research which highlights the importance of a coordinated policy approach to prevention.²⁹

In addition, we note that a range of other prevention related recommendations are currently 'in progress' including:

- Recommendation 6.1³⁰ introducing mandatory child sexual abuse prevention curriculum in Tasmanian schools;
- Recommendation 6.8³¹ to adopt a statewide approach to responding to child sexual abuse in schools including Catholic and independent schools; and
- Recommendation 18.1³² the Tasmanian Government should advocate to receive the full benefit of Australian Government prevention strategies.

While we support efforts to progress prevention-focused recommendations, commentary is somewhat limited by the lack of centralised, public information available about their implementation. We highlight the need for greater transparency in the Implementation Project below.

²⁵ Victoria – Child Information Sharing Scheme (2023) and [Family Violence Information Sharing Scheme](#).

²⁶ Queensland – [Information Sharing guidelines: to meet the protection and care needs and promote the wellbeing of children](#) (2018) and [Domestic and Family Violence Information Sharing Guidelines](#) (2017).

²⁷ **Recommendation 19.1** 1. The Tasmanian Government should develop a whole of government child sexual abuse reform strategy for preventing, identifying and responding to child sexual abuse, including child sexual abuse in institutions and harmful sexual behaviours.

²⁸ Sexual Assault Support Service, [Submission to the National Strategy to Achieve Gender Equality](#), 2023, pp. 3.

²⁹ Australian Government, Quadara, A., Nagy, V., Higgins, D., & Siegel, N., Australian Institute of Family Studies, [Conceptualising the prevention of child sexual abuse](#) (2015), Final Report, p. 55.

³⁰ **Recommendation 6.1** The Department for Education, Children and Young People should introduce and fund a mandatory child sexual abuse prevention curriculum as part of the mandatory respectful behaviours curriculum from early learning programs to Year 12, across all types of government schools (including specialist schools).

³¹ **Recommendation 6.8** The Department for Education, Children and Young People should work with the Catholic and independent school sectors to adopt a statewide approach to responding to child sexual abuse in schools.

³² **Recommendation 18.1** The Tasmanian Government should continue to advocate for Tasmania to receive the full benefit of Australian Government prevention strategies, including under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030*.

Enhancing policy coordination across the Implementation and broader reform project

We acknowledge the significant cross-agency reform effort underway through the Implementation Project. As such, we also wish to highlight the need for consistent, coordinated, whole of government policy approaches to address the intersecting drivers and risks associated with child sexual abuse. This includes a whole of government policy framework to inform the development of public policy, and a more coordinated approach to consultation.

Whole of government policy framework

While reform is underway to improve the safety and wellbeing of children, we note that concurrent public policy work, such as the development of the Police Powers and Responsibilities Bill (the 'Bill') may lead to increased risks to children. While the consultation material for the Bill highlighted that the proposed powers of arrest are not intended to apply to children, organisations such as TasCOSS have expressed significant concern about the expansion of police powers of arrest. In their submission, TasCOSS state that the proposed powers are 'likely to increase interactions between police and young people, which is concerning given recent research highlighting safety concerns experienced by children when interacting with police, as well as early contact with police as a predictive factor for later involvement in the legal system.'³³ While the Bill is not directly linked to the Implementation Project, it highlights the need for greater policy coordination and raises concerns about conflicting policy development given that the Commission of Inquiry made explicit recommendations to reduce contact between children and the youth justice system (Recommendation 12.13 – Diversionary Services Framework).³⁴

Similarly, we note that child sexual abuse cannot be addressed in isolation to issues which may elevate risks of harm. This position is reinforced by the Final Report of the Australian Institute of Family Studies, which states the following about the prevention of child sexual abuse:

Child maltreatment prevention can only be effective when the broader social policy contexts around childhood that intersect with the protection of children and prevention of harm are acknowledged and included in a prevention agenda, such as:

- *public health services, including mental health, disability, maternal and child health services, etc.;*
- *housing and homelessness services, including refugee resettlement;*
- *education;*
- *domestic violence, juvenile sex offenders, crime prevention and justice system responses;*
- *drug and alcohol and other adult-focused services;*
- *Indigenous health and social services;*
- *child care and early childhood services;*

³³ TasCOSS, Submission to the Police Powers and Responsibilities Act – Proposal Paper (January 2025), p. 6.

³⁴ [Recommendation 12.13](#) 1. The Tasmanian Government, in reviewing current diversion processes and developing a Diversionary Services Framework, should: (a) examine the exercise of police discretion to determine whether opportunities for cautioning and community conferencing are being maximised, particularly for Aboriginal children and young people, and children and young people without a strong family support network; (b) commission research to examine the effectiveness of formal cautions imposed with undertakings and the sanctions imposed by community conferences, to ensure they are proportionate to the alleged offending and not unnecessarily onerous; (c) introduce legislation to widen the range of alleged offences in respect of which diversion may be pursued and create a presumption in favour of pre-court diversion for children and young people. 2. The Tasmanian Government should begin statewide delivery of new diversion programs under the Diversionary Services Framework by 2025.

- *employment and income security; and*
- *family law and family relationships services...*³⁵

As such, we have previously recommended that the Tasmanian Government develop or adapt a whole of government, policy framework to ensure that all policy and legislative reform that affects children and families, is informed by and meets key indicators required to prevent child sexual abuse and promote child rights, wellbeing and safety. The 'Child Rights Impact Assessment Tool' is one example and has been recommended for use the National Children's Commissioner³⁶ and supported by TasCOSS³⁷ to assist policy makers to systematically assess the impact of reforms on children's rights and wellbeing, and to monitor the impacts of policy decisions upon children and families. Incorporating a tool like this into policy design would support government and non-government stakeholders to understand potential conflicts across the reform agenda and would promote a more consistent, coordinated approach to policy development across government.

A more coordinated approach to consultation

Community consultation across the Implementation Project has been extensive to date. While it has been welcome, it has also been accompanied by a number of challenges and opportunities for improvement to consultation timelines, coordination across agencies, and to stakeholder communication.

While there have been recent and welcome examples of longer consultation periods (including the twelve weeks provided for both the Change for Children Strategy, and the Commissioner for Children and Young People Bill 2024), it has not unusual to be asked to provide feedback to consultation material within a two to three week turnaround. We recognise the significant time pressures experienced by the public service through the Implementation Project, however such tight consultation timelines limit meaningful engagement, both for those with lived experience, as well as for non-government organisations who often support part time workforces. When we have been provided by Government with information about consultation plans in advance, we have been able to more effectively plan, prepare for, prioritise and resource our participation in consultations. We believe that an annual published consultation plan (even one subject to change) would greatly improve participation in consultation processes and would support cross-agency collaboration and community consultation.

We have also emphasised the importance of standardising where appropriate, the development and publication of consultation summary reports to enhance transparency and to 'close the loop' with stakeholders. This is especially critical given the significant involvement of people with lived experience, either directly, or through non-government organisations participating in consultation processes. Publishing reports that clearly outline the key themes and rationale behind policy decisions can promote accountability and assist in building and maintaining trust with stakeholders.

Best practice – consulting with people with lived experience

³⁵ Australian Government, Quadara, A., Nagy, V., Higgins, D., & Siegel, N., Australian Institute of Family Studies, [Conceptualising the prevention of child sexual abuse](#) (2015), Final Report, p. 55.

³⁶ Australian Human Rights Commission, '[Help way earlier!': How Australia can transform child justice to improve safety and wellbeing](#) (2024).

³⁷ TasCOSS, submission to the Joint Sessional Committee Inquiring into the implementation of the Commission of Inquiry recommendations (February 2025).

The Commission of Inquiry highlighted the importance of ensuring that reform initiatives are informed by people with diverse lived experience and recommended the establishment of youth advisory groups for specific institutional contexts including out of home care (Recommendation 9.6)³⁸, youth detention (Recommendation 12.8),³⁹ as well as the establishment of an adult survivors advisory group (Recommendation 19.5).⁴⁰ While the Commission of Inquiry recommended that advisory work with young people should be informed by best practice empowerment and participation strategies, they did not deliver specific recommendations about best practice policy infrastructure in the context of the victim survivor advisory group.

Existing literature outlines best practice for collaborating and co-designing with victim survivors of all ages, and underscores the need for consultative, advisory, partnership and co-design mechanisms that are trauma-informed, culturally safe and that promote and safety of participants.^{41, 42} We have previously emphasised the importance of best practice frameworks and standards to guide consultation with victim survivors and believe that this is particularly critical as the expertise of those with lived experience is being increasingly sought across government and non-government sectors. This kind of infrastructure supports a unified approach to integrating lived experience into policy processes and can address potential inconsistencies in the level of support provided through consultation and advisory processes, in remuneration for victim survivors, and conditions of engagement.⁴³

A coordinated approach to workforce planning and professional development

Alongside specialist sector stakeholders, we have previously recommended that the Tasmanian Government develop a comprehensive ten-year Workforce Strategy to establish a more strategic, long-term approach to workforce planning and professional development, building on, but beyond the scope of the Commission of Inquiry recommendations.⁴⁴

³⁸ [Recommendation 9.6](#) 1. The Department for Education, Children and Young People should, in consultation with the Commission for Children and Young People (Recommendation 18.6), develop an empowerment and participation strategy for children and young people in **out of home care** [emphasis added]. This strategy should have regard to best practice principles for children's participation in organisations at the individual and systemic levels.

³⁹ [Recommendation 12.8](#) The Department for Education, Children and Young People should, in consultation with the new Commission for Children and Young People (Recommendation 18.6), develop an empowerment and participation strategy for children and young people in **detention** [emphasis added], having regard to best practice principles for children's participation in organisations.

⁴⁰ [Recommendation 19.5](#) 1. The Tasmanian Government should ensure, in setting out the governance structure for the child sexual abuse reform strategy and action plan, that children and young people and adult victim-survivors of child sexual abuse are part of this governance structure through: (a) the Premier's Youth Advisory Council; (b) the establishment of an advisory group comprising adult victim-survivors of child sexual abuse, including child sexual abuse in institutions, of different ages, backgrounds, cultures, gender identities and geographical locations and parents of child victim-survivors... 3. These advisory groups should: (a) be guided by clear terms of reference that have been developed in consultation with the advisory groups; (b) have a clear purpose and objectives in terms of how they can contribute across the whole of government; (c) receive secretarial support and be adequately funded and resourced; (d) ensure trauma-informed processes apply in their interactions; (e) support and enable members' attendance by covering the costs of travel and expenses, and providing honorariums where appropriate.

⁴¹ University of Melbourne, [The Family Violence Experts by Experience Framework](#) (2020).

⁴² MacSween, M., Melham, M., & Petridis, T., [Experts By Experience: What we can learn from Commission of Inquiry Case Studies](#) (2024), pp. 5.

⁴³ Domestic Violence Victoria, [The Family Violence Experts by Experience Framework, Research Report and Framework 2020](#).

⁴⁴ SASS submission to the Tasmanian Government - Change for Children Strategy (September 2024).

The Commission of Inquiry made a substantial number of recommendations to strengthen the capacity and capability of the Tasmanian workforce to support children and families. While many of the recommendations focussed on the Government workforce,⁴⁵ others also considered the needs of the non-Government workforce. This includes Recommendation 9.10 which calls for the development of a workforce strategy for the child and family welfare sector.⁴⁶ The Commission of Inquiry emphasised that this strategy should equip the broader workforce with the knowledge and skills required to respond effectively to the needs of children and young people and should increase staffing and retention. Additionally, it should aim to improve workplace conditions, and reduce unplanned vacancies, particularly within DECYP.

We strongly believe that a strategic, well-resourced workforce strategy should be developed in partnership with key stakeholders from the community services sector, including specialist sexual assault services, to ensure the Tasmanian workforce is well positioned to prevent and respond to children sexual harm in all settings. It should address critical workforce needs such as minimum qualifications and accreditations, supervision requirements, cross-sector learning, peer workforce development,⁴⁷ and lived experience within the workforce.⁴⁸ The strategy should also support professional pathways and ongoing development for workers who engage with children and families, such as specialist sexual assault practitioners, lawyers, forensic examiners, medical staff, disability support workers, and early childhood education professionals.

It should proactively plan for and mitigate current and future workforce shortages; incorporate forward budgeting to sustain workforce growth and stability; be informed by research and data, and be accompanied by a robust monitoring, evaluation and learning model.

Transparency and accountability

The Commission of Inquiry emphasised the need for strong accountability mechanisms to oversee and underpin the Implementation Project.

Currently, the Tasmanian Government reports on the status of the Implementation Project through the 'Keeping Children Safe' website.⁴⁹ While this provides non-government stakeholders with a point of contact and some information about recommendation implementation, we have previously raised concerns about information gaps, and how the recommendations are being assessed as 'completed'. In doing so we have also highlighted opportunities to enhance accountability and transparency by publishing more detailed and meaningful updates about the Implementation Project.

⁴⁵ Such as [Recommendation 6.5](#), The Department for Education, Children and Young People should adopt and implement a training certification program that is mandatory for all education staff and volunteers. This training should be structured to provide basic and advanced levels of training for different role holders and targeted most directly at staff and volunteers operating in higher-risk settings; and [Recommendation 9.28](#), 1. The Department for Education, Children and Young People should establish a Harmful Sexual Behaviours Support Unit to support best practice responses to harmful sexual behaviours across the Department, including in schools, Child Safety Services, out of home care and youth detention.

⁴⁶ [Recommendation 9.10](#), The Department for Education, Children and Young People should develop a workforce strategy for the child and family welfare sector.

⁴⁷ Royal commission into Institutional Responses to Child Sexual Abuse, [Final Report: Advocacy, support and therapeutic treatment services](#) (2017), Vol. 9, pp. 47.; Grealy, C., Farmer, J., Milward, K., & McArthur, M., [Capturing practice knowledge from the Royal Commission support model](#), report prepared for the Royal Commission into Institutional Responses to Child Sexual Abuse (2017), pp. 17, 20.

⁴⁸ Safe and Equal, [Sources of Lived Experience in the Family Violence Sector: Issues Paper](#) (2022).

⁴⁹ Tasmanian Government, Keeping Children Safe, [Recommendation Status](#).

The Keeping Children Safe website had identified that Recommendation 19.1,⁵⁰ for example, was completed prior to 15 August 2024, even though the consultation period remained open until 30 September.⁵¹ This raises broader concerns about the criteria used to determine completion and whether other recommendations have been marked as complete before they have been fully implemented. We recognise that there is a tension in meeting the established, phased, implementation timelines and the development of best practice policy. However, rather than focusing on the number of recommendations marked as complete or in progress,⁵² we recommend that the government provide more comprehensive, high-level updates on the practical progress being made, including key milestones, challenges and consultations progressed.

Transparency in State Budget allocations

In addition to concerns about transparent reporting on implementation of the recommendations, we note that while the 2024-25 Tasmanian State Budget papers included funding to progress some recommendations, they did not provide sufficient detail about how the funds were being allocated. For instance, the 2024-25 State Budget included an allocation of \$831,000 ‘treatment programs for offenders and non-offenders’, with an additional \$3.2 million allocated over the forward estimates to support the implementation of Recommendation 16.17.⁵³ While the budget papers outline that this funding will establish a ‘preventative group and one-on-one counselling treatment programs for: people who have been convicted of abusing children (and are statutory clients); those who identify themselves as being at risk of such offending; and those who are no longer under a correctional order but require ongoing treatment or maintenance to prevent risk escalation,’⁵⁴ there is little publicly available information on how these programs are being implemented. Although the Keeping Children Safe website notes that the Department of Justice is leading this work and that it is ‘in progress’, the website does not communicate details about consultation, program development, service provision, or expected outcomes.⁵⁵ As such we support greater transparency in communication about progress pertaining to the Implementation Project to promote greater understanding and participation within the reforms.

Harmful sexual behaviours

The Commission of Inquiry made a range of recommendations to respond to the prevalence and impact of harmful sexual behaviours in Tasmania, with a focus on increasing awareness and understanding, reducing stigma and shame, strengthening community and workforce capacity, and improving access to trauma-informed, specialist therapeutic interventions. Key recommendations include Recommendation 9.28,⁵⁶ which calls for the establishment of a harmful sexual behaviours

⁵⁰ The development of a whole of government child sexual abuse reform strategy for preventing, identifying and responding to child sexual abuse, including child sexual abuse in institutions and harmful sexual behaviours.

⁵¹ At the time of writing this submission, we note that the Change for Children Strategy (Recommendation 19.1) is in the final stages of development.

⁵² [KCS reform progress update to 31 October.pdf](#)

⁵³ Tasmanian Government, [Government Services, Budget Paper No 2, Vol. 1](#), 2024-25 Tasmanian State Budget, p. 134.

⁵⁴ Tasmanian Government, [Government Services, Budget Paper No 2, Vol. 1](#), 2024-25 Tasmanian State Budget, p. 138.

⁵⁵ Tasmanian Government, Keeping Children Safe, [Recommendation Status](#).

⁵⁶ [Recommendation 9.28](#) 1. The Department for Education, Children and Young People should establish a Harmful Sexual Behaviours Support Unit to support best practice responses to harmful sexual behaviours across the Department, including in schools, Child Safety Services, out of home care and youth detention. The unit should: (a) provide advice, guidance, and support across the Department; (b) develop context-specific policies for all settings informed by the Tasmanian Government’s statewide framework and plan to address harmful sexual behaviours (Recommendation 21.8); (c) work

support unit, and Recommendation 21.8,⁵⁷ which advocates for a statewide framework and plan for preventing, identifying, and responding to harmful sexual behaviours.

While we support the policy focus on harmful sexual behaviours, it is essential to understand a child's engagement with harmful sexual behaviours within a broader context of child sexual harm. Many children who engage with harmful sexual behaviours have experienced trauma, with key drivers being family violence, heightened exposure to pornography, child sexual abuse and other forms of maltreatment.⁵⁸ As such, effective prevention, intervention and response to harmful sexual behaviours requires an integrated approach that places harmful sexual behaviours within the continuum of child sexual harm (including child sexual abuse and exploitation).

While responding to harmful sexual behaviours is an area of speciality, policy action to strengthen community and workforce capacity to prevent, identify, and respond to harmful sexual behaviours must occur alongside broader efforts to prevent and address all forms of child sexual harm. This requires an intersectional approach that promotes policy and practice responses to harmful sexual behaviours that are evidence-based, trauma-informed, and embedded within a comprehensive framework that addresses the full spectrum of child sexual harm. We have therefore previously recommended that the implementation of the harmful sexual behaviours recommendations be

closely with the Quality and Risk Committee (Recommendation 9.5) to ensure systemic risks, practice issues and opportunities for improvement are identified. 2. The Tasmanian Government should allocate additional funding to support responses to harmful sexual behaviours in out of home care and youth justice. 3. The Harmful Sexual Behaviours Support Unit should develop detailed out of home care-specific policies, protocols and practice guidance to support best practice responses to harmful sexual behaviours in out of home care. 4. The Department should ensure the advanced professional development for departmental staff in understanding and responding to harmful sexual behaviours (Recommendation 9.11) includes tailored professional development for both Child Safety Officers and carers, and is available to staff in relevant roles in schools and youth justice. 5. The Department should ensure staff working in the Harmful Sexual Behaviours Support Unit are suitably experienced or undertake additional professional development to advance their knowledge in responding to harmful sexual behaviours. 6. The Department should ensure Power to Kids or another program or approach with comparable components is implemented in government funded residential care homes as a supplementary strategy to address the heightened risk of harmful sexual behaviours (including child sexual exploitation and dating violence) in out of home care.

⁵⁷ [Recommendation 21.8](#) 1. The Tasmanian Government, in collaboration with key stakeholders, should develop a statewide framework and plan for preventing, identifying and responding to harmful sexual behaviours. The framework should: (a) agree on a common definition and understanding of harmful sexual behaviours, including adopting a recognised, contemporary continuum of sexual behaviours from 'developmentally expected' to 'harmful'; (b) use an evidence-informed framework for understanding, preventing, identifying and responding to harmful sexual behaviours; (c) clarify the roles and responsibilities of the various agencies and departments involved in preventing and responding to the full continuum of harmful sexual behaviours, including programs delivered by non-government providers; (d) meet the needs of particular groups of children (Recommendation 21.6); (e) include structures to support ongoing engagement with emerging evidence regarding harmful sexual behaviours; (f) include an evaluation framework. 2. The Tasmanian Government should ensure the therapeutic service system for children who have displayed harmful sexual behaviours: (a) provides sufficient therapeutic services that can be accessed in a timely manner; (b) ensures timely access to therapeutic services for all children who need them, regardless of their age, identity or location in the state (including in youth detention); (c) ensures specialist interventions for children with disability; (d) ensures all providers of therapeutic interventions for harmful sexual behaviours have Aboriginal representation in their governance structure. 3. The Tasmanian Government should provide ongoing and increased funding for specialist therapeutic interventions for harmful sexual behaviours that: (a) ensures children who have displayed abusive or violent harmful sexual behaviours and their families need not wait more than two weeks for support when therapeutic treatment is required; (b) provides an advisory service for child-facing organisations, such as independent schools, childcare, disability and at-risk youth services and Tasmania Police (this service is not intended for the Department for Education, Children and Young People, which will have access to an internal Harmful Sexual Behaviours Support Unit (Recommendation 9.28)); (c) contributes to the statewide plan for preventing harmful sexual behaviours and its agencies' responses to children who have displayed such behaviours.

⁵⁸ ANROWS, [Good practice in delivering and evaluating interventions for young people with harmful sexual behaviours](#) (2020), p. 8.

guided by an integrated framework (Recommendation 21.8) that supports cohesive, well-coordinated, and specialised responses to the continuum of child sexual harm.

Opportunities for change

In reflecting on the progress of the Implementation Project to date and the points outlined above, SASS encourage the Inquiry to consider the following recommendations:

- The Tasmanian Government take a renewed focus on prevention, including further policy reform to advance whole of community, public health initiatives that address the underlying drivers of child sexual harm.
- The Tasmanian Government develop or adapt a whole of government policy framework (such as the Child Rights Impact Assessment Tool) to ensure that the rights, safety and wellbeing of Tasmanian children are centred within the Implementation Project, as well as the broader reform agenda.
- The Tasmanian Government make a number of changes to improve consultation processes:
 - o Develop a future focussed, publicly available consultation plan to support government and non-government stakeholders to prepare for, allocate resources toward and engage meaningfully in consultation processes.
 - o Standardise the development and publication, where appropriate, of consultation summary reports to 'close the loop' and communicate how information was gathered and why it has been used.
 - o Utilise trauma-informed, culturally safe, best practice frameworks for engaging people with lived experience in consultation, advisory and co-design processes.
- The Tasmanian Government should develop a ten-year workforce strategy to promote a comprehensive approach to planning for the workforce and professional development needs of the children and families sector, beyond the scope of Recommendation 9.10.
- The Tasmanian Government should enhance transparency by:
 - o Providing more detailed updates on the progress of recommendations – moving from a simple status update of 'in progress' to 'completed', to public reporting on key milestones, challenges and outcomes associated with individual recommendations.
 - o Publishing additional details about budget allocations in the State Budget papers pertaining to the Implementation Project.

Policy pertaining to harmful sexual behaviours should be considered through an integrated lens that acknowledges the specialised nature of this work while recognising that harmful sexual behaviours should be addressed alongside the continuum of child sexual harm.